



Filed via ECF

The Honorable Paul A. Crotty
United States District Court for the Southern District of New York
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street, Room 1350
New York, NY 10007-1312

January 13, 2023

Re: Baerga, et al. v. City of New York, et al., Case No. 21-CV-05762
The Bronx Defenders' Request for Leave to File Excess Pages in Forthcoming
Letter Motion

Dear Judge Crotty:

We are civil attorneys at The Bronx Defenders, a public defender non-profit addressing the causes and consequences of criminal, civil, immigration, and family legal system involvement. Simultaneous with this request, we are filing a letter motion outlining our intent to file an Amicus brief in support of plaintiffs' request for a preliminary injunction, and we kindly request that the Court grant us leave to file excess pages in the letter motion.

With respect to SDNY Local Rule 11.1(b) and Rule 1 of Your Honor's individual rules of practice, we understand that all letter submissions must be double-spaced and must not exceed three (3) pages in length. However, given the range of arguments that plaintiffs' counsel asserted in their Memorandum of Law (Docket # 109), and the foreseeable harms of the City's Mental Health Involuntary Removals Policy on the clients and community members that we serve, we wanted to ensure that our letter motion thoroughly previewed our unique scope of expertise and the civil and other consequences we anticipate this Policy triggering. Accordingly, in its current version, our letter motion is five (5) double-spaced pages, including our signature block.

We look forward to sharing our submission with you and thank you in advance for your consideration of this matter.

Respectfully submitted,

/s/

The Bronx Defenders
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* Application for admission to S.D.N.Y. forthcoming

cc: All Counsel (via ECF)